

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

SYNOPSYS, INC., a Delaware corporation,)	
)	
)	
Plaintiff,)	C.A. No. 05-701 (GMS)
)	
v.)	
)	
MAGMA DESIGN AUTOMATION, INC., a Delaware corporation,)	
)	
)	
Defendant.)	

**PLAINTIFF SYNOPSYS, INC.'S MOTION TO BIFURCATE
AND STAY ANTITRUST COUNTERCLAIMS AND TO BIFURCATE
AND STAY ALL CLAIMS AFFECTED BY LIKELY PTO REEXAMINATIONS**

Plaintiff Synopsys, Inc. ("Synopsys") hereby moves for an Order bifurcating and staying the antitrust counterclaims of defendant Magma Design Automation, Inc. ("Magma"), and bifurcating and staying all claims affected by the likely reexaminations by the United States Patent and Trademark Office. The grounds for this motion are set forth in Synopsys' opening brief, filed herewith.

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Karen Jacobs Louden

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January 23, 2006

503024

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

SYNOPSYS, INC.,)	
a Delaware corporation,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 05-701 (GMS)
)	
MAGMA DESIGN AUTOMATION,)	
a Delaware corporation,)	
)	
Defendant.)	

ORDER

The Court having considered Plaintiff Synopsys, Inc.'s ("Synopsys") Motion to Bifurcate and Stay Antitrust Claims and To Bifurcate and Stay All Claims Affected By Likely PTO Reexamination (the "Motion"), and the briefs and other papers filed with respect thereto, IT IS HEREBY ORDERED this ____ day of _____, 2006 that:

1. The Motion is GRANTED.
2. All proceedings relating to Counterclaims 1 to 6 of Magma Design Automation, Inc.'s ("Magma") Amended Answer and Counterclaims (D.I. 7) are hereby STAYED for purposes of discovery and trial until further Order of this Court.
3. All proceedings relating to Synopsys' U.S. Patent Nos. 6,434,733 (the "733 patent") and 6,766,501 (the "501 patent") are hereby STAYED for purposes of discovery and trial until further Order of this Court.
4. Magma shall identify to Synopsys any prior art that it contends is material to the patentability of the '733 and '501 patents within 30 days of entry of this Order so that it may be considered in the context of the requested reexamination proceedings.
5. Synopsys shall notify the Court within ten business days of any final

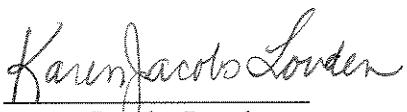
disposition relating to the requested reexamination of the '733 patent or the requested reexamination of the '501 patent.

Sleet, J.

503077

RULE 7.1.1 CERTIFICATE

I certify that counsel for plaintiff Synopsys, Inc. ("Synopsys") has raised the subject of the foregoing motion with counsel for defendant Magma Design Automation ("Magma") and that Magma has indicated that it expects to oppose the motion. (See, e.g., D.I. 17).



Karen Jacobs Louden

January 23, 2006
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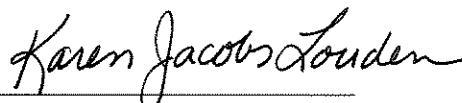
CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on January 23, 2006, I electronically filed the foregoing with the Clerk of the Court using CM/ECF which will send notification of such filing to William J. Wade.

I further certify that I caused that copies of the foregoing be served on the following counsel in the manner indicated:

By Hand

William J. Wade
Richards Layton & Finger
One Rodney Square
P.O. Box 551
Wilmington, DE 19801



Karen Jacobs Louden